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9  
10 UNITED STATES DISTRICT COURT  
11  
12 NORTHERN DISTRICT OF CALIFORNIA

13 INTERNATIONAL FUR TRADE  
14 FEDERATION, an unincorporated association;

15 Plaintiff,

16 – against –  
17

18 CITY AND COUNTY OF SAN FRANCISCO;  
19 and

20 DR. GRANT COLFAX, an individual, in his  
21 official capacity as Director of the San  
22 Francisco Department of Public Health;

23 Defendants,

24 and

25 THE HUMANE SOCIETY OF THE UNITED  
26 STATES; and

27 ANIMAL LEGAL DEFENSE FUND;

28 Intervenor-Defendants

Case No. 3:20-cv-00242-RS

**DECLARATION OF MICHAEL  
TENENBAUM IN SUPPORT OF  
STIPULATION AND [PROPOSED]  
ORDER RE IFF'S COMBINED  
OPPOSITION TO MOTIONS TO DISMISS**

1 I, Michael Tenenbaum, declare as follows:

2 1. I am a lawyer duly licensed in the State of California. I represent the Plaintiff  
3 International Fur Trade Federation (“IFF” or “Plaintiff”) in this action. I have personal knowledge of  
4 the facts set forth in this declaration and could competently testify to such facts if called upon to do so.  
5 So as to avoid the burden on the Court of multiple declarations, I am filing only this declaration in  
6 support of the accompanying Stipulation and Proposed Order, having first shared a draft of it with  
7 counsel for Defendants and counsel for Intervenors and received no objection to doing so.

8 2. While the briefing schedule on Defendants’ and Intervenors’ separate motions to  
9 dismiss contemplated that IFF would file an opposition to Defendants’ motion by May 25, 2020, and a  
10 separate opposition to Intervenors’ motion, as I was preparing the oppositions I determined that I  
11 could avoid the duplication of effort for the Court (and for myself) that filing two separate opposition  
12 briefs would entail. Having informed counsel for Defendants and for Intervenors, I filed a single brief  
13 containing IFF’s combined opposition to both Defendants’ and Intervenors’ motions, which I filed on  
14 May 27, 2020.

15 3. While I was able to combine IFF’s opposition to both motions (which motions were 24  
16 and 15 pages, respectively), and would have been able to take up to 25 pages to oppose each in  
17 separate briefs under Civil L.R. 7-3(a), IFF’s combined opposition is 29 pages (even after substantial  
18 editing over two additional days to reduce its original size), which exceeds the ordinary page limit for  
19 a single brief.

20 4. In light of the foregoing, I certainly agree to Defendants’ and Intervenors’ request for  
21 an additional day for their reply briefs.

22 I declare under penalty of perjury of the laws of the United States that the foregoing is true and  
23 correct.

24 Dated: May 28, 2020

/s/ Michael Tenenbaum

25 Michael Tenenbaum